

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Sears Holdings Corporation, et al.,

Debtors.¹

Case No. 7:18-bk-23538 (RDD)

Chapter 11

(Jointly Administered)

**MOTION FOR WITHDRAWAL OF BRADLEY R. SCHNEIDER
AS ATTORNEY OF RECORD**

Bradley R. Schneider, Esq. (“Counsel”), hereby moves (the “Motion”) the Court, pursuant to Rule 2090-1(e) of the Local Rules of Bankruptcy Procedure of the United States Bankruptcy Court for the Southern District of New York, to enter an order permitting Counsel to withdraw as counsel of record for Whirlpool Corporation (“Whirlpool”) on the ground that Counsel is no longer affiliated with

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); SR – Rover de Puerto Rico, LLC (f/k/a Sears, Roebuck de Puerto Rico, Inc.) (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Rover Brand Business Unit, LLC (f/k/a Sears Brands Business Unit Corporation) (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

Munger, Tolles & Olson LLP, which continues to represent Whirlpool in connection with this matter.

WHEREFORE, it is respectfully requested that the Court authorize the withdrawal of Counsel from the above-captioned Cases and instruct the Clerk of the Court to remove Counsel from any applicable notice and service lists. A proposed order is attached hereto as Exhibit A.

Dated: August 15, 2022

Respectfully submitted,

By: /s/ Bradley R. Schneider
Bradley R. Schneider

CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2022, a copy of the foregoing was filed electronically and that a true and accurate copy of the foregoing was served on the all parties served by the Court's CM/ECF noticing system.

/s/ Bradley R. Schneider
Bradley R. Schneider

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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Sears Holdings Corporation, et al.,

Debtors.¹

Case No. 7:18-bk-23538 (RDD)

Chapter 11

(Jointly Administered)

**ORDER GRANTING MOTION FOR WITHDRAWAL OF
BRADLEY R. SCHNEIDER AS ATTORNEY OF RECORD**

Upon consideration of the Motion (the “Motion”) of Bradley R. Schneider (“Counsel”) to withdraw his appearance on behalf of Whirlpool Corporation (“Whirlpool”) in the above-referenced bankruptcy case, and the Court having jurisdiction to consider the Motion in accordance with 28 U.S.C. §§ 157: and no

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additional notice or hearing being required under the circumstances; and good and sufficient cause appearing, it is hereby:

ORDERED, THAT Bradley R. Schneider is removed pursuant to Local Bankruptcy Rule 2090-1 as counsel of record for Whirlpool in the above-captioned case and shall be removed from any applicable notice and service lists.

Dated: _____
White Plains, New York

THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE